

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

TELEFONAKTIEBOLAGET LM ERICSSON

Plaintiff,

v.

C.A. No. 5:23-cv-00569

LENOVO (UNITED STATES), INC.,
LENOVO (SHANGHAI) ELECTRONICS
TECHNOLOGY CO. LTD., LENOVO
BEIJING, LTD., LENOVO GROUP, LTD.,
MOTOROLA (WUHAN) MOBILITY
TECHNOLOGIES COMMUNICATION CO.,
LTD., AND MOTOROLA MOBILITY, LLC,

Defendants.

LENOVO (UNITED STATES), INC., AND
MOTOROLA MOBILITY LLC,

Counterclaim-Plaintiffs,

v.

TELEFONAKTIEBOLAGET LM ERICSSON,
ERICSSON AB, AND ERICSSON INC.

Counterclaim -Defendants.

**EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER AND
DEFENDANTS' MOTION FOR AN ANTISUIT INJUNCTION RELATED TO
ERICSSON'S FOREIGN INJUNCTIONS AGAINST LENOVO PRODUCT SALES**

Defendants and Counterclaim-Plaintiffs Lenovo (United States), Inc. and Motorola Mobility LLC (collectively, "Lenovo") by and through their undersigned attorneys, hereby move for a temporary restraining order and an antisuit injunction enjoining Plaintiff Telefonaktiebolaget LM Ericsson ("Ericsson") from enforcing any injunction orders issued in foreign jurisdictions (or

seeking more of the same) against sales of Lenovo products, including at least Brazil and Colombia, on patents declared by Ericsson as standard essential patents (SEPs) that are the subject of the contract claims raised by both sides in this action. Ericsson's pursuit of these injunctions threatens to obstruct the resolution of this case and impinge upon this Court's jurisdiction to decide the parties' claims, and irreparably harm Lenovo. For the reasons set forth in Lenovo's accompanying memorandum filed contemporaneously herewith, Lenovo respectfully requests that the Court grant this TRO and set a preliminary injunction hearing within 14 days of the Court's order. Ericsson, the party that filed this case, received notice of this TRO application through the Court's ECF system.

Dated: December 29, 2023

Respectfully submitted,

/s/ Raymond M. Bennett

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Forthcoming

*Counsel for Lenovo (United States), Inc. and
Motorola Mobility LLC*